

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case
Burlingame v. Bin Laden, et al., 02-cv-7230 (GBD)(SN))

The *Burlingame XI* Personal Injury Plaintiffs' Motion for Partial Final Judgments

EXHIBIT B

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STATE OF NEW JERSEY)
COUNTY OF MONMOUTH)

LING N. YOUNG, hereby states under penalty of perjury that:

1. I am a resident citizen of the State of New Jersey, currently 67 years of age, and I am a survivor of the attacks on the World Trade Center on September 11, 2001. I was severely burned on September 11, 2001 in the South Tower (Tower 2) of the World Trade Center.
2. I was born in Canton, China, in 1952. My family moved to the United States when I was eleven years old. I graduated from New York City Community College, with an Associate Degree in Accounting in 1973. I married my husband, Donald, on July 1, 1973. We have three children, Richard, Melissa and Donald, Jr.
3. I was hired by the New York State Department of Taxation and Finance in September 1973 as a tax auditor. I continued my education at night and ultimately graduated from Long Island University with a B.S. in Accounting in 1976. I worked steadily as a tax auditor with the New York State Department of Taxation until September 11, 2001.
4. I thoroughly enjoyed my work as a tax auditor and hoped to work up through the standard retirement age of 65. I was confident in my job at the Department of Taxation and excelled in several areas. In fact, I mastered subjects that allowed me to work within the Income, Corporation, Gains (Real Property Tax) and Revenue Crimes Departments. Based on my inability to heal from

my injuries, I will never be able to return to work. This fact has affected not only our household income, but my emotional state as well.

5. Before September 11, 2001, I was a vibrant, outgoing individual. I enjoyed the outdoors, going to parties, and entertaining friends and family. I enjoyed arts and crafts and was especially proficient at designing and making clothing. I loved to travel. In the two years prior to September 11, 2001, my husband and I traveled extensively all over the world. With our children grown, my husband and I were enjoying more quality time with each other.

6. On September 11, 2001, I was looking forward to my day at work; I loved my job and I enjoyed meeting my friends and colleagues at the office. I was near my desk, talking to my supervisor on the 86th floor of the South Tower of the World Trade Center, when the North Tower was struck by an aircraft and began to burn. We witnessed the explosion and immediately felt heat that passed through the windows and entered our floor. I immediately went into a corridor on the 86th floor and encountered fellow employees who were milling around trying to decide what to do. Ultimately, we elected to take a local elevator to the Sky Lobby on the 78th Floor.

7. On the 78th Floor, there was a large number of people standing around, waiting for elevators to go the lobby. I recall the Port Authority then instructing people over the intercom system to go back to their desks because only the North Tower had been affected. Before I could make a decision as to what I should do, I heard a second explosion and heard glass breaking. I immediately lost consciousness. The next thing I remember was that I was on the floor and things were on top of me. I couldn't see, because my glasses were covered with blood. I don't know how long I was on the floor. I was bleeding from cuts on my face and forehead and felt extremely hot.

8. I cleaned my glasses and looked around the 78th floor Sky Lobby. Although clouded by dense smoke, I saw a wasteland before me. Dead bodies were all around. At the other end of the lobby, and in all of the elevators, I saw orange flames. Everywhere, there were screams.

9. There was a woman who had no legs lying next to the elevator. I gingerly hoisted myself on top of some debris, where four of my colleagues from the Department of Taxation sat. I now know that all four of them perished as a result of the subsequent building collapse; only one colleague and I survived.

10. I remained sitting on the 78th floor waiting for help for approximately 15-20 minutes, too much in shock to notice the searing heat. The lobby was dark and filled with smoke; there were bodies and body parts all around us, and there were many people crying out for help. I can recall seeing at least 100 or more people in the lobby prior to the explosion, but only a handful of us survived the blast. Out of the darkness, a young man appeared wearing a red bandana; he was advising people to enter a staircase that he had located just off of the lobby.

11. I attempted to lift one of my colleagues who was having trouble walking. She put her arms around my neck, but it was so painful I had to put her down. I had just become aware of my burns. To this day, I am haunted by my inability to help her; I failed my friend and colleague.

12. The young man with the red bandana proceeded to carry a woman on his back and I followed him down approximately ten flights of stairs. When we reached cleaner air, he dropped off the woman on the staircase and proceeded back up to help other people.

13. I continued down the staircase to the 51st floor where I encountered a New York Fire Department Supervising Fire Marshall who guided me to a service elevator on the 40th floor and, miraculously, it was still in operation. We took that service elevator to the lobby. We left the

building and entered the intersection of Church and Vesey Streets, where we located an ambulance. I was immediately taken to the Cornell Burn Unit.

14. My first surgery occurred on September 14, 2001. It was a skin graft operation and would prove to be the first of many. The most agonizing aspect of the treatment that I received in the Burn Unit related to the tank scrub room where staples would be pulled out of existing skin grafts and my raw skin would be scrubbed with sponges to exfoliate dead skin. Although I have an extremely high threshold for pain, the tank scrub room provided the most painful experiences of my life.

15. While I was administered a great deal of pain medication, nothing seemed to take the edge off the pain. Whenever I was moved or touched I wanted to scream. Even today, I can recall feeling immobilized and extremely hot throughout my hospitalization. My doctors have told me that I will feel “hot” for the rest of my life because I lost most of the sweat glands in my hands, back, neck and my thighs.

16. I now know that I was burned over 40% of my body. What you must consider is the fact that the rest of my body was used to harvest skin for skin grafts. This “harvesting” of skin from healthy areas caused the equivalent of new second-degree burns in those areas. If you examine my body today, very little remains unscarred by the events of September 11, 2001, and, given my peculiar reaction to the skin grafts, I am scarred from the top of my head to my legs. The areas of my body that were burned are now neighbors to horrifically scarred donor sites. Based on my unusual skin type, my body is now covered with thick and raised scar tissue that limits my movements and contorts my appearance.

17. Physically, my scars result from many surgical complications that have left me with deforming keloid and hypertrophic scars running along the length of my hands, arms, portion of

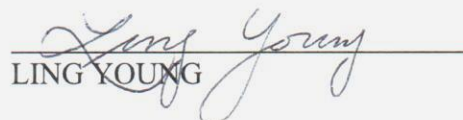
my face, legs and other body parts. Since my scarring has not improved, I slowly resigned myself to life as a permanently disfigured and disabled person.

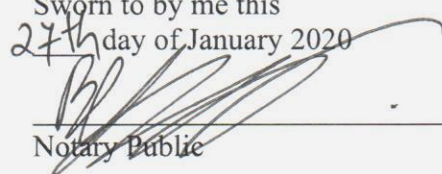
18. I have now undergone at least 40 surgeries, many of which were in-patient stays to address my burns and the scarring that resulted. With each surgery came the overwhelming fear that I would not survive the procedure. After 40 such experiences, I gave up, instead resigning myself to increasing disability and disfigurement as my life goes on. I cannot physically or emotionally tolerate another surgery. As a result I have lost most function in my left hand.

19. My doctors have told me that I will never again be able to enjoy a day in the sun. Before my injuries, I would spend most of my leisure time swimming, bathing, and relaxing on the beach. My favorite vacations were to sunny places. I will never be able to engage in these activities again. I will never again experience some of the greatest joys in my life.

20. Emotionally, I am a shell of the person that I once was. I still experience nightmares and anxieties resulting from my experience on September 11th. The emotional trauma that I sustained as a result of September 11th is difficult to put into words. I do not like to think about what I observed on the 78th floor Sky Lobby on September 11, 2001. I have nightmares about the screams that I heard and the sights that I observed. I think about my many work colleagues who we were forced to leave on the 78th floor because we could not move them due to their injuries. I am deeply disturbed by all of these things and do not know whether I will ever be able to lead a normal life.

Dated: Morganville, New Jersey
January , 2020


LING YOUNG

Sworn to by me this
27th day of January 2020

Notary Public

